

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kathleen McLean

Title: Vice President

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: August 23, 2000

ITEM: DTE RR 330 Please see the attachment to DTE-ATT 1-5 (a seven-page document entitled, "Problems with BA Pre-Order Time-Outs and Unavailability"): From April to the present, please list the CLEC-reported outages included in Verizon's measurement for pre-order interface availability. Please indicate which, if any, AT&T-reported outages listed in the attachment to DTE-ATT 1-5, were not included in this Verizon-reported measurement and the reasons for not doing so. In addition, provide a list of all trouble tickets opened with Verizon during this period involving CLEC-reported pre-order interface availability problems, together with the Verizon-stated reason for the outage.

REPLY: Each of the three parts of this response addresses trouble tickets involving CLEC-reported pre-order interface problems which AT&T has characterized as "interface availability" problems. When a CLEC-reported incident is determined to be a result of the unavailability of the interface system itself (EDI, CORBA or Web GUI), then the incident is captured in Verizon's interface availability measurement. Importantly, not every CLEC reported pre-order interface problem is an "interface availability" problem nor it is necessarily caused by the interface system itself. The interface systems provide CLECs access to the underlying back-end OSSs that fulfill the pre-order functions. These back-end OSSs are the same for both the wholesale and retail businesses. When one of the back-end OSSs is unavailable, it is equally unavailable to both wholesale and retail – a parity access condition. The Verizon interface availability measurement is intended to capture an out-of-parity access condition that could exist if the back-end OSSs were available to Verizon retail but could not be accessed by the CLECs because the interface systems were not available.

REPLY: DTE RR 330 Attachment 1 lists the CLEC-reported incidents that were attributable to one of the interface systems and, therefore, were included in Verizon's interface availability measurement. The ticket number listed is the lead ticket number with which the availability outage is associated.

(cont'd)

Attachment 2 lists AT&T-reported incidents, some of which were attributable to the interface system itself (in the case of AT&T the interface used is CORBA) and were included in Verizon's interface availability measurement. Others were not attributed to the Verizon interface and, therefore, were therefore not included in the interface availability measurement. In the latter cases, an explanation is provided. This attachment contains CLEC-specific proprietary data. A copy is being provided under the terms of the Protective Order only to the DTE and AT&T.

The nature of CORBA, the interface that AT&T has chosen, is synchronous, thereby, causing AT&T to report "outages" irrespective of the fact that the "outage" could be related to AT&T's systems and connectivity, not just Verizon's interface or back-end OSSs. For a number of the AT&T-reported outages, Verizon has proven that the problem was not with the Verizon interface or back-end OSSs and, in fact, for the last month Verizon has been involved in intensive dialogue with AT&T regarding these issues.

Attachment 3 includes all CLEC-reported pre-order interface incidents for the period April 2000 to July 2000 for the three interface systems (EDI, CORBA, Web GUI). Not all CLEC-reported pre-order interface availability problems are outages. The response indicates when the problem was attributable to the interface itself being unavailable and therefore is included in Verizon's interface availability measurement. When the incidents are not included in the measurement, an explanation is provided.

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REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: August 23, 2000

ITEM: DTE RR 340 (1) Please review the attachment to the Lichtenberg/Sivori Joint Declaration filed in July 2000 (mentioned in ¶ 102 of this joint declaration). Please indicate whether and why Verizon disagrees with any WorldCom-reported outages (as opposed to a slow-down) listed in this attachment. (2) If not already addressed in Verizon's response to record request 330, please indicate whether and why Verizon disagrees with any AT&T-reported outages listed in its attachment to DTE-ATT 1-5.

REPLY: Verizon provides advance notification to the CLECs when changes will occur to the published availability of the interface systems themselves (EDI, CORBA, Web GUI) or to specific transactions that are fulfilled by shared back end OSS's. These back-end OSSs support the business transactions of both the Wholesale and Retail businesses. Depending on the backend OSS that is unavailable, different pre-order transactions are affected which is explained in the Verizon notification. Further, in some cases, the change in back-end OSS availability may only affect certain jurisdictions which is also specified in the Verizon notification. In most of these situations, the Wholesale interfaces (EDI, CORBA, Web GUI) remain available even though certain transactions are not. The notification is provided as exceptions to the regular hours of operation published on the Wholesale web site (http://www.bell-atl.com/wholesale/html/cd_sys_avail.htm), or is sent in the form of a bulletin, in accordance with current Change Management procedures, if the change is occurring with less than 30 days notice. The web site includes up to 3 months of planned periods of unavailability for work on back-end OSSs.

- 1.) Attachment 1 provides a list of the WorldCom-reported outages and slow-downs for the period April through June 2000 from the attachment to the Lichtenberg/Sivori Joint Declaration filed in July

REPLY: DTE RR 340
(cont'd)

2000. This is the period of time for which Verizon could reconcile the information. For the WorldCom classified outages, Verizon indicates whether it agrees or disagrees with WorldCom's

categorization as a pre-order interface outage. Where Verizon disagrees, a reason is indicated. Verizon was only able to address those instances for which a specific Verizon trouble ticket number was provided or Verizon was able to locate a change control notification (e.g., for scheduled outages). If a ticket number was not provided, Verizon is unable to verify the information and therefore disagrees with the characterization of "outage".

2.) This request is fulfilled in Verizon's reply to record request 330 – part 2.

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D.T.E. 99-271

Respondent: Robert Kenney

Title: Director – Regulatory Planning

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: August 31, 2000

ITEM: DTE RR 351 POP-1-4-8 in KPMG's report indicates that 14 expected PCNs were not received by KPMG. Please provide an explanation for these missing PCNs.

REPLY: As indicated at ¶ 73 of the OSS Supplemental Affidavit, Verizon-MA's analysis of the 14 PCNs not received by KPMG indicates that one was still in a query state awaiting a KPMG response, four related to a minor system problem that was corrected on May 25, and the remaining nine were related to two minor system problems that were corrected on August 19, 2000.

NET RR# 159

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Robert Kenney

Title: Director – Regulatory Planning

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: August 31, 2000

ITEM: DTE RR 352 POP-1-4-9 in KPMG's report indicates that 20 orders receiving PCNs did not receive BCNs. Please provide an explanation for these missing BCNs.

REPLY: In response to Verizon-MA's request for supporting data, KPMG provided a list of 18 PON's (not 20) for which it did not receive a BCN. Of the 18, Verizon-MA is unable to account for 3, or one half of one percent of the total PONs processed. Verizon-MA records show that a BCN was sent to KPMG for 7 of the PONs for which KPMG indicated it did not receive a BCN.

The remaining 8 PONs were hot cut orders that were cancelled because the CLEC was not ready. Since the orders were not completed, a BCN should not have been expected. A PCN was issued against these PONs because the hot cut process requires the issuance of an internal Record Order. The Record Order was completed prior to the cancellation of the hot cut. At that point, DCAS considered all activity associated with the PON to be accounted for and issued a PCN for the Record Order completion. This was a sequencing error on the part of Verizon-MA. Had the Record Order been revoked prior to the hot cut cancellation, the PCNs would not have been erroneously sent.

NET RR# 160

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Marilyn DeVito

Title: Director

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: August 31, 2000

ITEM: DTE RR 353 Refer to Table 3-8 on page 122 of KPMG's report. KPMG indicated at a technical session that it was unable to obtain information from Verizon regarding the 43 orders that did not flow-through in the commercial flow-through test. Please provide an explanation for the lack of flow-through on these orders.

REPLY: KPMG provided its list of 43 orders that did not flow-through to Verizon-MA on July 11, 2000. Verizon's initial review indicated that the entire list consisted of New York orders issued by KPMG several months earlier. Verizon-MA was concerned about a flow-through analysis in Massachusetts utilizing New York orders and discussed its concerns with KPMG and the Department Staff. These discussions took place shortly before KPMG issued its first draft of the final report. As a result, there was not enough time to resolve Verizon-MA's concerns prior to the issuance of the final report, and therefore, the issue remained open.

Verizon-MA's subsequent review of the 43 orders resulted in the findings provided on the attached spreadsheet. The 43 orders fall into four general categories. Twelve of the orders were not currently designed to flow through and should not have been expected to flow through. Twenty-three orders contained invalid data on the existing account and, therefore, required manual review to process. Five orders were rejected due to an error on CLEC order. Two orders were not able to flow through because a required legacy system was down at the time the orders were processed. And one order, listed on line 8, did flow through. This attachment contains CLEC-specific proprietary data. A copy is being provided under the terms of the Protective Order only to the DTE and AT&T.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

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D.T.E. 99-271

Respondent: Robert Kenney

Title: Director – Regulatory Planning

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: August 31, 2000

ITEM: DTE RR 354 Footnote 36 on page 56 of KPMG's report states: "The Address Validation pre-order response returned a 'SUIT' or 'UNIT' in the location detail. An 'APT' was required on the subsequent order. Of the sample ADRs reviewed, 64% returned inaccurate location data." Provide Verizon's explanation for the 64% inaccuracy rate.

REPLY: The 64% inaccuracy rate on address validation experienced by KPMG was a direct result of a test bed creation error encountered solely as part of the KPMG test and would not -- and could not -- be experienced in actual commercial production.

Specifically, prior to the start of a KPMG test, Verizon-MA created a list of fictitious addresses to accommodate accounts that KPMG would utilize during its test. Once the addresses were established, Verizon-MA personnel manually entered the data into the PREMIS (now Livewire) system for address validation purposes. In addition, other Verizon-MA employees created service orders to establish the test accounts in the Billing system. The error in these dual processes occurred when the employees creating the service orders utilized "apt" numbers which was inconsistent with the "suit" or "unit" numbers utilized by the employees who entered the address data into the PREMIS/Livewire system. This scenario does not occur in a live commercial environment because in the commercial environment, address data is updated via a mechanized feed into Livewire and service representatives utilize that information in preparing service orders for new accounts.